

EPA's Role in Stimulating Recycling Markets and Creating Demand

Cheryl Coleman, Director

Resource Conservation and Sustainability Division, US EPA

June 10, 2020

U.S. EPA



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Importance of the U.S. Recycling System

- Recycling provides valuable feedstock to the manufacturing sector.
- Recycling creates jobs! EPA estimates that 757,000 jobs and \$36.6 billion in wages result from recycling.
- EPA's America Recycles Initiative launched in November 2018.

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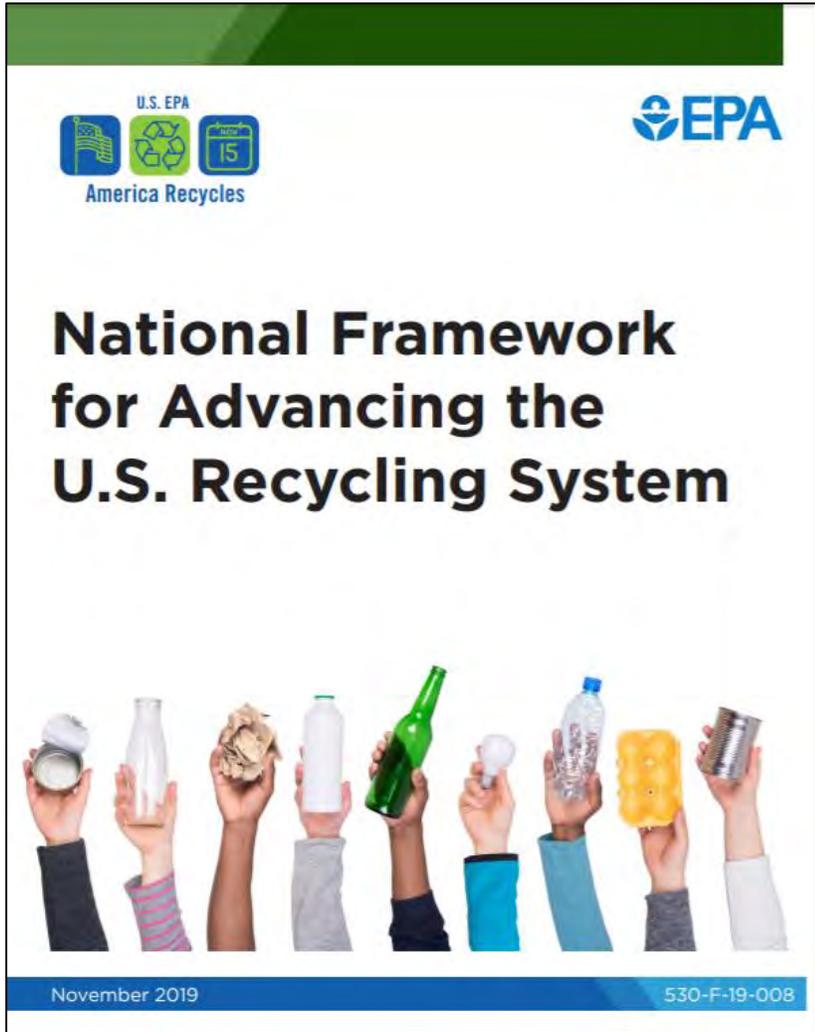
U.S. Recycling System Challenges

- Consumer confusion about how to recycle properly
- Investments needed in processing infrastructure
- Lack of domestic markets
- Align data to measure recycling system performance.

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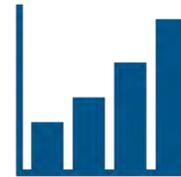
Promoting education and outreach



Enhancing materials management infrastructure



Strengthening secondary materials markets



Enhancing measurement

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EPA's Role

Provide National Leadership

- Implement the *National Framework to Advance the U.S. Recycling System*
- Develop a national recycling strategy and national recycling goal(s)

Support State and Local Governments

- Public Service Announcements on recycling “right” during COVID-19
- Update EPA's *Measuring Recycling: A Guide for State and Local Governments*

Enhance Supply and Demand of Recyclables

- Hold regional and state market development workshops
- Promote preferred procurement of recycled content products

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THANK YOU!

**To learn more about America Recycles,
please visit**

<https://www.epa.gov/americarecycles>

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APR's Recycling Demand Champion Campaign & PCR Certification Program

Steve Alexander, APR President & CEO



**The Association of
Plastic Recyclers**

WHO IS APR?





Increase
Supply



Enhance
Quality



Expand
Demand



Communicate
Value

APR Primary Goals



The Association of
Plastic Recyclers

WHAT DO WE DO?



- APR Design® Guide for Plastics Recyclability
- Training
- Advocacy
- APR Recycling Demand Champions
- PCR Certification
- Resource Development
- Education

APR Podcasts



- ▶ Recycled Content 24 days ago

Sustainability in Packaging, Featuring John Caturano of Nestlé Waters

23:15

♥ Like ↻ Repost ➦ Share ⋮ More ▶ 120
- ▶ Recycled Content 1 month ago

The True Value of PCR with Greg Janson, CEO of QRS Inc.

36:43

♥ 1 ↻ Repost ➦ Share ⋮ More ▶ 79
- ▶ Recycled Content 2 months ago

COVID-19 and the Recycling Industry, featuring Brent Bell of Waste Management Recycle America

28:40



*“Given the current fragile recycling economics,
a demand-pull for recycled plastics...*

is needed to start building positive momentum in the near term.”

Ellen MacArthur Foundation



APR Recycling
**DEMAND
CHAMPIONS**



- **Strengthen & increase domestic demand**
- **Boost a circular economy for plastic recycling**
- **Help prevent “ocean plastics” by stimulating domestic markets**
- **Mitigate reliance on export markets**

APR Recycling
**DEMAND
CHAMPIONS**



Champions Commit to increase their
PCR use in coming year

Any new use of domestic PCR qualifies

APR Recycling DEMAND CHAMPIONS



Become an APR Recycling
DEMAND CHAMPION

Let's Get Started!

Participating in this critical program is simple.

- STEP 1** → **SIGN COMMITMENT LETTER**
APR Recycling Demand Champion Pledge – I will be an APR Recycling Demand Champion!
"I commit to participate in the APR Recycling Demand Champion Program to drive PCR use of broad specification PCR. I will provide an initial list of future actions to the APR within 60 days and timely report progress so positive impacts may be anonymously aggregated and collectively reported. I believe demand creates value and value drives recycling."
https://www.plasticsrecycling.org/images/Recycling_Demand_Champions/APR_Demand_Champion_Campaign_Commitment_2_2018.pdf

- STEP 2** → **OPTION A – CHOOSE PCR CONTAINING ITEM(S) TO PURCHASE**
Everyday use/catalog order items are easily available and actively being used. Examples include:
 - trash bags
 - mop buckets
 - trash cans
 - totes
 - recycle bins
 - safety signsAlso, many companies are purchasing WIP (work-in-process) items:
 - pallets
 - collapsible pallets
 - crates
 - totes
 - large liquid containersFor vendors, visit: <https://plasticsrecycling.org/recycling-demand-champions/vendors>

- **OPTION B – EXPAND YOUR CURRENT USE OF PCR**
Increase the amount of PCR in a current product or application, or develop a new product or application for PCR.

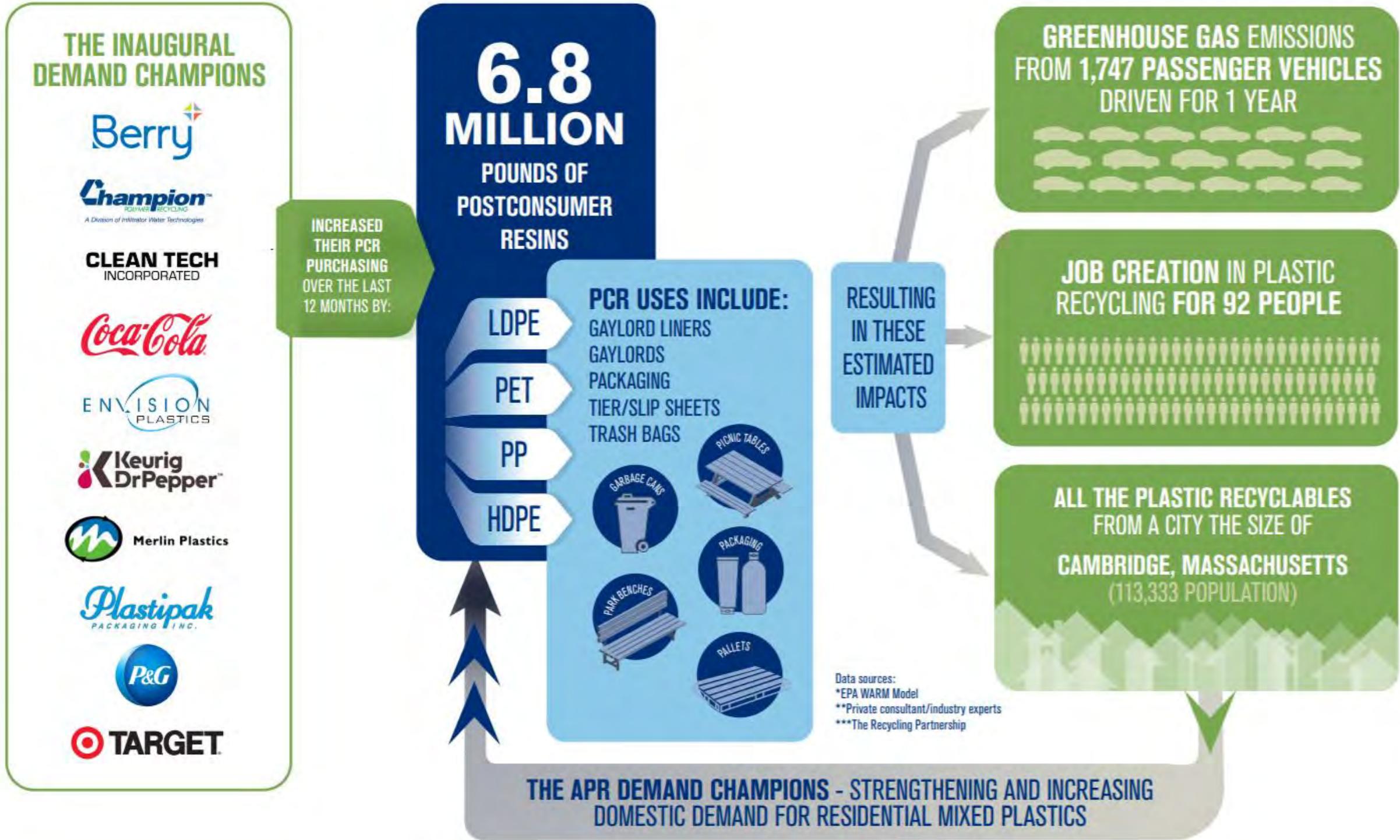
- STEP 3** → **PURCHASE & REPORT ITEM(S)**
Within 12 months of becoming a Demand Champion purchase or manufacture your PCR containing item(s) and report to APR. All data submitted to APR will remain confidential. NDAs can be executed upon request.

- ONGOING** → **PROMOTION & RECOGNITION**
Your company's prominent role in expanding the markets for mixed residential plastics will be actively promoted by APR. Visit <https://plasticsrecycling.org/recycling-demand-champions> for a list of current Demand Champions and the far-reaching press the program has received.

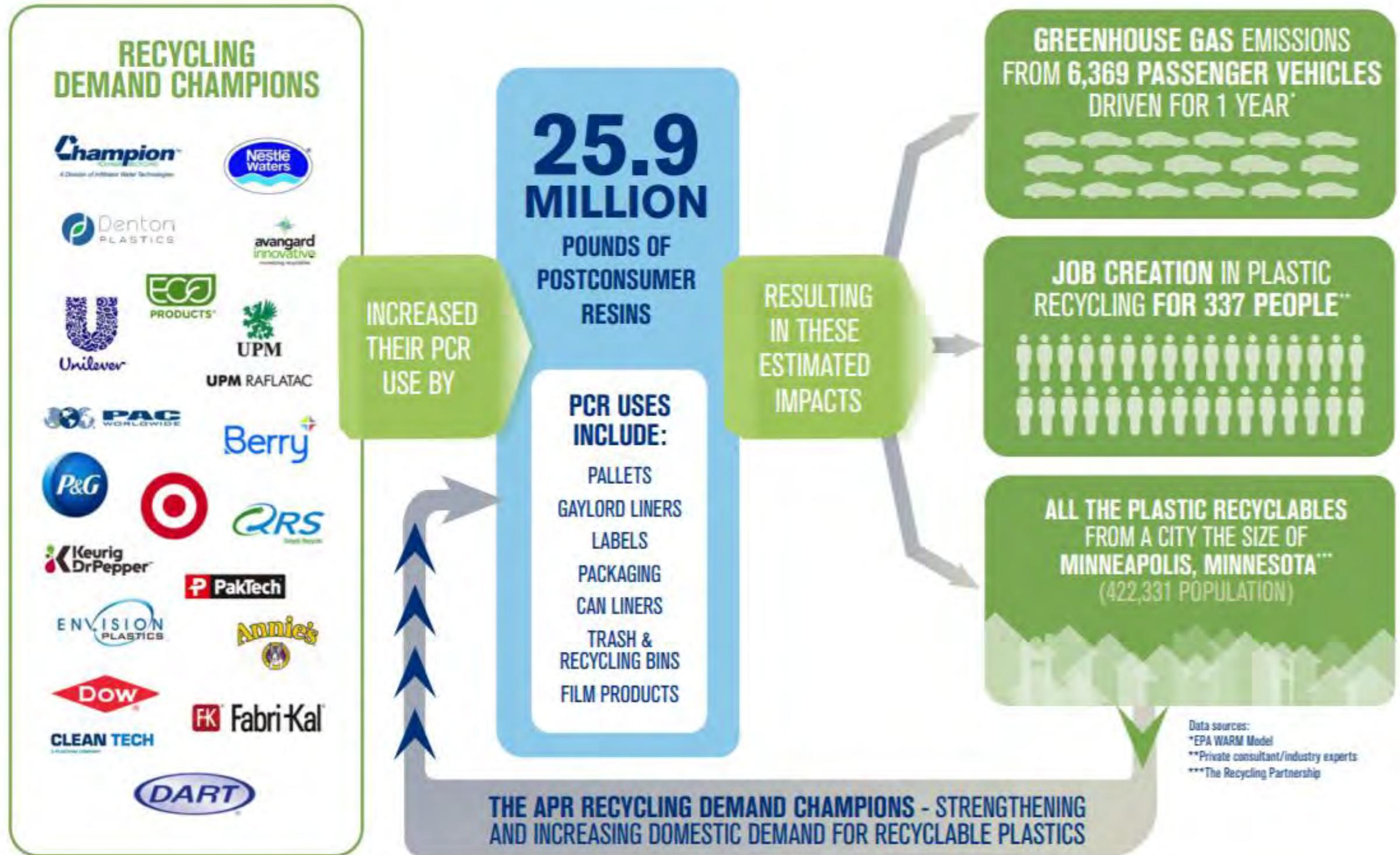
2018

10

Companies



2019 20 Companies



2020



40

Companies



PCR Certification Program Overview



What is the problem?

Supply: Reclaimers have PCR for sale but see their competitors passing off PIR as PCR

Demand: Brand Owners looking to buy PCR but skeptical of getting 1-2 drastically lower bids

When both sides need the same thing, this is **an industry problem.**



What is it the solution? *Certified PCR*

- Provides confidence that endorsed certification companies adhere to a **clear, consistent definition of PCR**.
- Helps **level the playing field** by endorsing multiple, credible third-party certifying bodies.
- Increases **accessibility & confidence** in certification across a diversity of PCR applications.



How does the PCR Certification Program work?

1. APR endorses third-party companies to conduct certifications.
2. Plastics reclaimers hire APR endorsed companies to conduct certification.
3. APR promotes program and certified PCR from APR members.



How does APR endorse the certifying companies?

- Use ISO 14021:2016 definition for PCR
 - *Material generated by households or commercial, industrial and institutional facilities,*
 - *in their role as end-users of the product,*
 - ***which can no longer be used for its intended purpose.***
 - *This includes return of material from the distribution chain.*
- Adhere by operating procedures
 - Required documentation
 - Mass Balance Analysis
 - Recycled Content Calculation
 - Annual Recertification Process
 - Site Visit
- Three-year endorsement



What does the PCR Certification program *not* include?

- APR does not certify PCR content; APR is not the certifier.
- Program is focused on the PCR pellet, flake, regrind and *not* products (yet!)
- PIR
- APR does not adjudicate “percentage of PCR content” disagreements.
- APR membership not a requirement
- APR does not collect a fee
- Application info remains confidential



But what if we didn't think of something?

A five-person Technical Support Group will arbitrate issues of concern.

1. APR Plastic Reclaimer
2. APR Board Member
3. APR-endorsed Certifying Company
4. Brand Owner
5. EPA Representative



Company	Contact	Email	Phone
AM Testing & Services, Inc.	Roger Matilla Bill Baumann	Roger@AMTesting.com BBaumann@AMTesting.com	(708) 907-5252
SCS Global Services	Nicole Munoz	NMunoz@scsglobalservices.com	(510) 452-8031
UL Verification Services Inc.	Bill Hoffman	bill.hoffman@ul.com	(847) 664-1112

I'm a reclaimer –
how do I get my
PCR certified?

Company	Contact Information	Certifying Company	Certification Date	PET	HDPE	PP	LDPE	LLDPE
Avangard Innovative, L.P	Marcus San Juan msanjuan@avaicg.com (713) 744-2300	AMI Testing & Services, Inc.	8/7/2019				X	X
Envision Plastics	Tamsin Ettefagh Tamsin.ettefagh@envisionplastics.com (336) 451-4767	SCS Global	2/10/2020		X			
Revolution	Cherish Miller cmiller@revolutioncompany.com (714) 801-3172	SCS Global	varies by location				X	X

I'm looking for certified PCR – how do I find it?



The Association of
Plastic Recyclers

Steve@PlasticsRecycling.org

PlasticsRecycling.org

About Comprehensive Procurement Guideline Program

Ronald Vance, Chief
Resource Conservation Branch,
Office of Resource Conservation and Recovery, US EPA

June 10, 2020

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Overview of Comprehensive Procurement Guideline Program

- Government buy-recycled program
- Authorized by the Resource Conservation and Recovery Act (RCRA), Section 6002
- Harnesses federal purchasing power to stimulate the demand for recovered materials
- Applies to procuring agencies using appropriated federal funds



- Widely referenced by government, universities, NGOs and the private sector

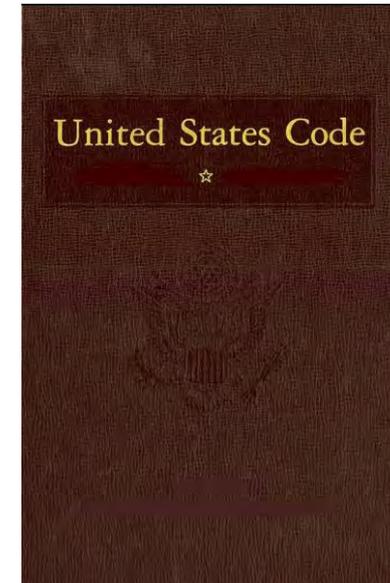
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EPA's Federal-Procurement Roles under RCRA

- **Under the statute, EPA has three responsibilities:**
 - To designate items that are or can be made with recovered materials
 - To recommend procurement practices to assist procuring agencies
 - To provide information on recovered material content



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EPA Roles, cont'd

- **In Comprehensive Procurement Guidelines (CPGs)**, EPA designates items that are or can be made with recovered materials
- **In Recovered Materials Advisory Notices (RMANs)**, EPA recommends procurement practices and provides information on recovered material content



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Procuring Agency Responsibilities

- **Procuring agencies** must purchase designated items with highest percentages of recovered material practicable
- **Exceptions** include items that:
 - Are not reasonably available within a reasonable time
 - Fail to meet the performance standards
 - Are only available at unreasonable price

Sources of requirements to follow CPGs:

- RCRA statute, which directs federal agencies to revise specifications, and develop policies and procedures to maximize the use of recovered materials
- Executive Orders

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EPA Process to Designate Items and Issue Procurement Recommendations

A bifurcated process

- Designating items in a CPG is a rulemaking activity
 - CPGs are regulations and are codified
- RMANs are published in Federal Register notices for public comment
 - RMANs are guiding recommendations and are not codified



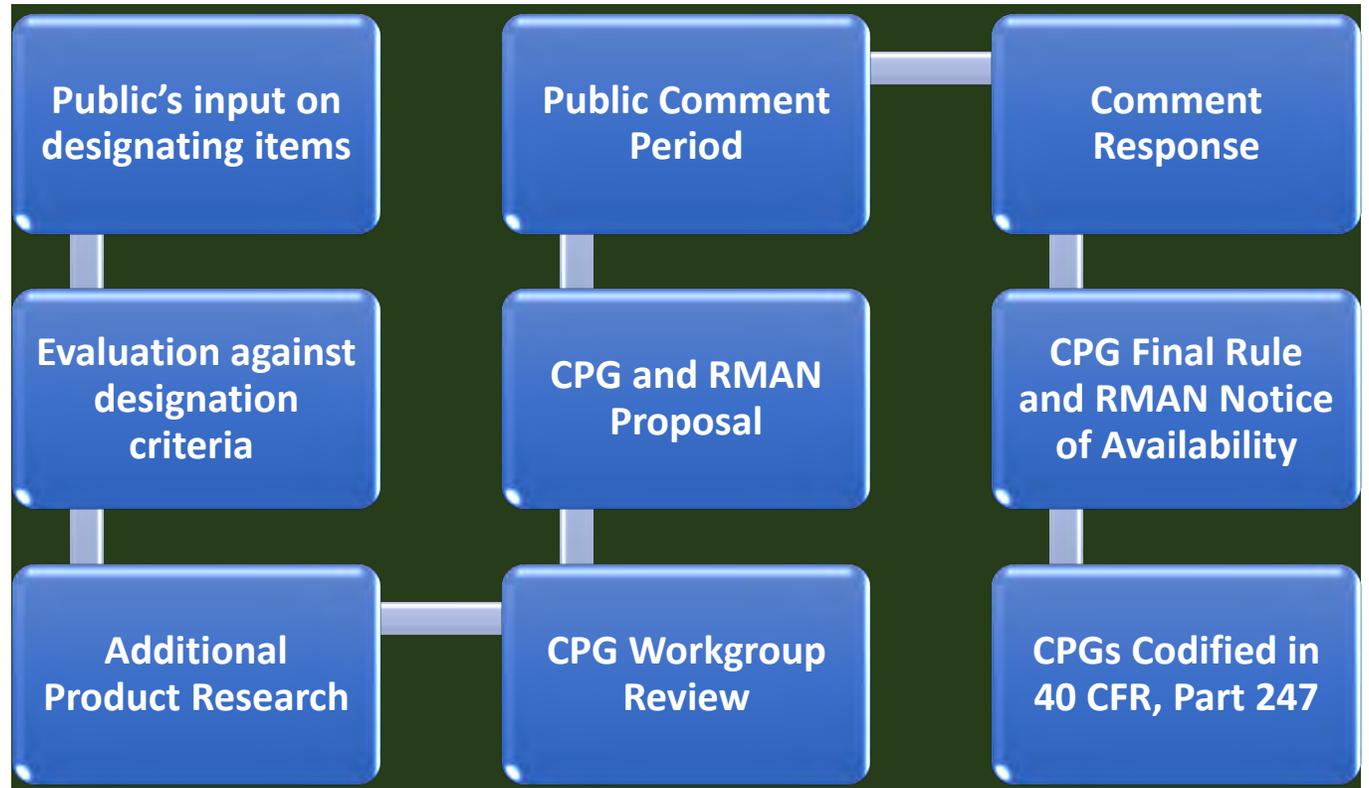
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Process, cont'd

- Process for codifying designations and publishing recommendations in the notices section of the Federal Register (FR) is defined



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Where We Are Today

<https://www.epa.gov/cpg>

EPA's main CPG-program webpage

- EPA issued five CPGs designating 61 items in eight distinct product categories
- EPA also published recommendations on purchasing designated items in RMANs



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Today, cont'd

In the main CPG-program webpage, EPA also provides the CPG Product Supplier Directory – an additional way EPA attempts to help procuring agencies buy recycled-content products

- EPA is supporting procurement agency purchasing in two other ways:
 1. **CPG Product Supplier Directory** that lists manufacturers, vendors, and suppliers for each item designated in CPGs
 - While the directory does not provide pricing, the contact information enables buyers to comparison-shop for informed purchasing decisions
 2. **ReCon Tool** that calculates GHG emission and energy use benefits of alternative recycled content purchasing decisions

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Example Designation and Recommendation

- **Postconsumer Recovered Material** - material or finished product that:
 - Served its intended use
 - Is diverted from disposal
 - Has completed life as a consumer item
- **Recovered Material** - material or byproduct diverted from waste
 - Excludes material commonly reused within an original manufacturing process

PARK & RECREATION PRODUCT ¹	MATERIAL	POST-CONSUMER RECOVERED CONTENT ²	TOTAL RECOVERED CONTENT ²
Park Benches and Picnic Tables	Plastic ³	90–100%	100%
	Plastic Composites	50–100%	100%
	Aluminum	25%	—
	Concrete	—	15–40%
	Steel ⁴	16% 67%	25–30% 100%
Plastic Fencing for Specified Uses ⁵	Plastic	60–100%	90–100%
Playground Equipment	Plastic ³	90–100%	100%
	Plastic Composites	50–75%	95–100%
	Steel ⁴	16% 67%	25–30% 100%

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Moving Forward

- Existing CPGs/RMANs were last updated in 2007
- **EPA is requesting comments** on the existing CPGs and RMANs via an FR non-rulemaking notice
- The FR notice will:
 - Increase awareness of government buy-recycled procurement programs
 - Give voice to stakeholders and the public
 - Assist the Agency with determining whether a future rulemaking is appropriate

Buying recycled products...

- ...fosters the recycling of materials
- ...stimulates recycling markets
- ...strengthens local economies
- ...strengthens the US' recycling system

Plus, it...

- ...conserves natural resources
- ...saves energy
- ...reduces solid waste
- ...reduces air and water pollutants
- ...reduces greenhouse gases
- ...creates new jobs

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THANK YOU!

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Judy Sheahan
Assistant Executive Director
The US Conference of Mayors and
Managing Director
Municipal Waste Management Association

Who We Are

The U.S. Conference of Mayors

- Established in 1932
- Cities with Populations of 35,000 or more
- 1,400 Mayors Throughout the United States

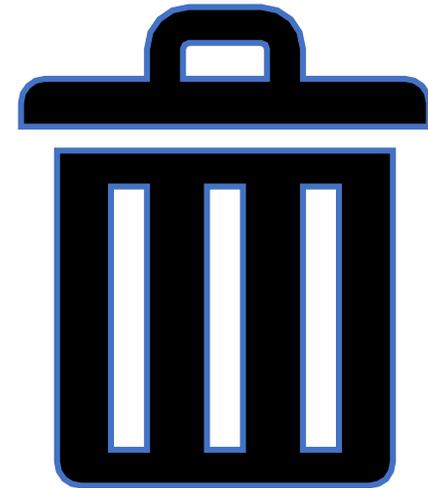
The Municipal Waste Management Association

- Established in 1982
- Solid Waste, Public Works, Recycling Professionals in Cities, Counties, States, and Authorities



Recent Headlines

- *As Costs Skyrocket, More Cities Stop Recycling*
- *Increased Costs Could Halt Curbside Recycling. Keeping It Will Cost You*
- *Cleveland Recycling on Hold*
- *The latest coronavirus side effect: Lots more curbside trash, but less recycling*





Cities
Believe
in
Recycling

Why Is Recycling Important to Cities?

Good for Overall Environment and Public Health Goals



Extend Landfill Capacity



Assists Sustainability Efforts



Components of GHG Reduction Strategy



Citizens Demand It

What We Need?



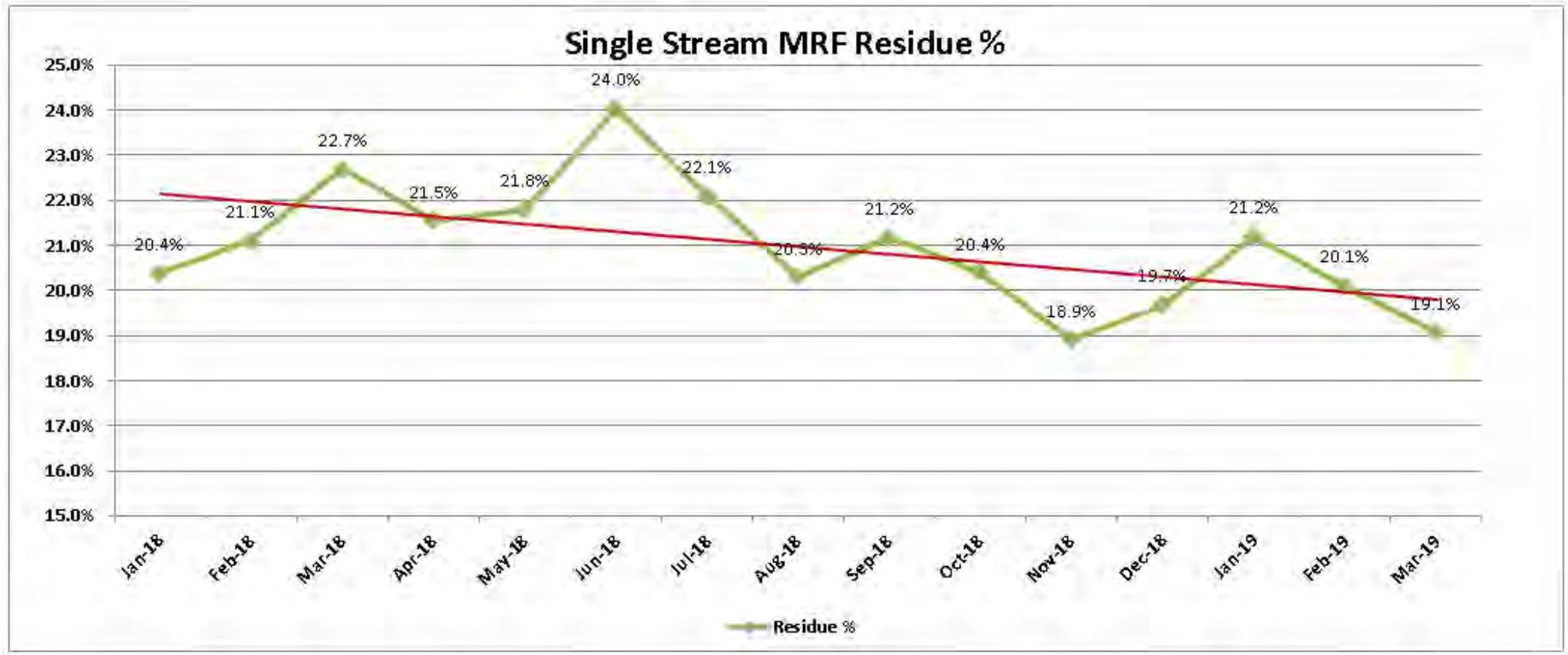
MARKETS, MARKETS,
MARKETS



CONSUMER EDUCATION

MRF Contamination Rates

(Source: Waste Management)



How Federal Procurement Assists Our Efforts



Federal Government is a Major Purchaser of Goods



Provides Guidance to Many Local and State Governments to Establish Similar Procurement Policies-



Results in More Purchasers - Large and Steady Customer for Goods



Private Sector Investments

The Federal Government Role in Procurement and Recycling Markets

- **Executive Order 12873** - Federal Acquisition, Recycling and Waste Prevention (1993)
- **Executive Order 13101** - Greening the Government Through Waste Prevention, Recycling, and Federal Acquisition (1998)
- **Executive Order 13423** (2007)
Strengthening Federal Environmental, Energy, and Transportation Management
- **Executive Order 13693** (2015)
Planning for Federal Sustainability in the Next Decade



Real
World
Example –
How
Federal
Policies
Impacted
Recycling

- Federalism Executive Orders
- USCM Buy Recycled Campaign
- USCM National Office Paper Recycling Project
- Private Sector Investments
- Upgraded Technology



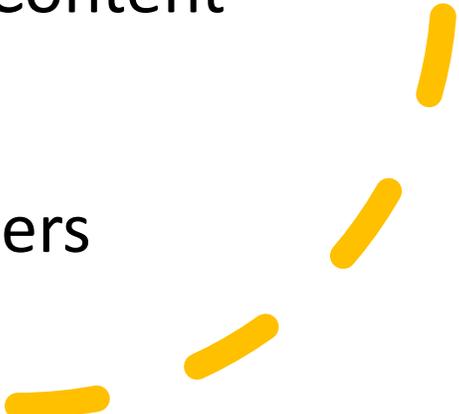
**Other Helpful
Federal &
Congressional
Actions**

- Education
- Investment
- Good Mandates



The Role of the Private Sector

Manufacturers and the Business Community

- Design Products that -
 - Minimizes Packaging
 - Truly Recyclable (i.e. Don't Call It Recyclable Unless Most Communities Can Easily Recycle It)
 - Use Post Consumer Content Materials
 - Policy to Buy Post-Consumer Content Products
 - Assist with Educating Consumers
- 



Concluding Thoughts



About Comprehensive Procurement Guideline FR Notice

Ksenija Janjic
Office of Resource Conservation and Recovery, US EPA

June 10, 2020

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Introduction

- Today, in **Federal Register Notice, 85 FR 19473**, EPA is seeking public comment on the existing CPG designations and RMAN recommendations
 - Opened on April 7th
 - **Will close July 6th**

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FR Notice: Topic Areas and Questions

- **Designated Items:**

- Based on procuring agencies purchases, are the right items designated?
- Do the items currently designated represent items that procuring agencies purchase?
- Should items be deleted, added or modified? Why?

- **Procurement Recommendations:**

- Are the recommended recovered content levels/ranges appropriate?
 - If not, please provide appropriate levels.
- Are the published specifications appropriate?
 - If not, please provide appropriate specifications.

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Where to Find Existing Documents

Federal Register Notices Related to the Guidelines for Procurement of Products Containing Recovered Materials

DESIGNATION/ RMAN	DATE PUBLISHED	FEDERAL REGISTER	ACTION TAKEN	Technical Background Documents	Other Supporting Documents
CPG I	May 1, 1995	60 FR 21370	CPG I Designated Products: 19 new items (Engine coolants, Structural fiberboard, Laminated paperboard, Cement/concrete containing ground granulated blast furnace slag, Carpet, Floor tiles, Patio blocks, Traffic barricades, Traffic cones, Playground Surfaces, Running Tracks, Hydraulic Mulch, Yard Trimmings Compost, Office recycling containers, Office waste receptacles, Plastic desktop accessories, Remanufactured toner cartridges, Binders, Plastic Trash Bags), plus five earlier procurement guidelines (Cement and Concrete Containing Fly Ash, Paper and Paper Products, Re-Refined Lubricating Oils, Retread Tires, Building Insulation)	Items Designated in the Comprehensive Procurement Guideline - Supporting Analyses	Docket number: EPA-HQ-RCRA-1995-0059

<https://www.epa.gov/smm/regulatory-background-comprehensive-procurement-guideline-program-cpg>

Includes links to FR notices and supporting documents, and information about CPG revisions and RMAN updates

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Designations in CPG I

CPG I, <u>60 FR 21370</u>	PRODUCT CATEGORY	ITEM
	CONSTRUCTION	Cement and Concrete*, Structural fiberboard, Laminated paperboard, Building insulation, Carpet*, Floor tiles, Patio blocks
	LANDSCAPING	Hydraulic mulch, Yard trimmings compost*
	NON-PAPER OFFICE	Office recycling containers, Office waste receptacles, Plastic desktop accessories, Remanufactured toner cartridges, Binders, Plastic trash bags
	PAPER	Paper and Paper products
	PARK & RECREATION	Playground surfaces, Running tracks
	TRANSPORTATION	Traffic barricades, Traffic cones
	VEHICULAR	Engine coolants, Re-Refined lubricating oils, Retread tires

* Item's designation revised or updated in a subsequent CPG

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Designations in CPG II

CPG II, 62 FR 60962	PRODUCT CATEGORY	ITEM
	CONSTRUCTION	Shower and restroom dividers/partitions, Consolidated and reprocessed latex paint for specified uses
	LANDSCAPING	Garden and soaker hoses, Lawn and garden edging
	NON-PAPER OFFICE	Printer ribbons, Plastic envelopes
	PARK & RECREATION	Plastic fencing for specified uses
	TRANSPORTATION	Parking stops, Traffic control devices (Channelizers, Delineators, Flexible Delineators)
	MISCELLANEOUS	Pallets

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Designations in CPG III

CPG III, 65 FR 3070	PRODUCT CATEGORY	ITEM
	CONSTRUCTION	Carpet cushion, Flowable fill, Railroad grade crossing surfaces*
	LANDSCAPING	Food waste compost*, Plastic lumber landscaping timbers and posts
	NON-PAPER OFFICE	Solid plastic binders, Plastic clipboards, Plastic file folders, Plastic clip portfolios, Plastic presentation folders
	PARK & RECREATION	Park benches, Picnic tables, Playground equipment
	MISCELLANEOUS	Sorbents, Industrial drums, Awards and plaques, Mats, Signage including sign supports and posts, Manual-grade strapping

* Item's designation revised or updated in a subsequent CPG

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Designations in CPG IV

CPG IV, 69 FR 24028	PRODUCT CATEGORY	ITEM
	CONSTRUCTION	New: Modular threshold ramps, Nonpressure pipe, Roofing materials Revised: Cement and Concrete, Railroad grade crossing surfaces, Polyester carpet
	NON-PAPER OFFICE	Office furniture
	VEHICULAR	Rebuilt vehicular parts
	MISCELLANEOUS	Bike racks, Blasting grit

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Designations in CPG V

CPG V, <u>72 FR 52475</u>	PRODUCT CATEGORY	ITEM
	LANDSCAPING	New: Fertilizer Revised: Compost made from recovered organic materials

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Recommendations in RMANs

RMANs generally align with CPGs , but recommendations for several items may fall in their own RMAN or may have been updated in subsequent RMANs

ITEM	ORIGINAL	UPDATED
Paper	Paper RMAN I	Paper RMAN II
Floor tile	RMAN I	RMAN II
Plastic batt building insulation	RMAN I	RMAN I Update
Steel shower and restroom dividers/partitions, Steel components of traffic barricades and delineators	RMAN II	RMAN III
Steel recycling containers, Steel waste receptacles	RMAN I	RMAN III
Cement and concrete, Polyester carpet	RMAN I	RMAN IV
Railroad grade crossing surfaces	RMAN III	RMAN IV
Compost	RMAN I & RMAN III	RMAN V

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Where to Find Regulatory Documents: Summary

CATEGORY	DESIGNATIONS	RECOMMENDATIONS
CONSTRUCTION	CPGs I, II, III & IV	<p>Compilation of all RMANs: https://www.epa.gov/smm/consolidated-recovered-materials-advisory-notices-rmans-comprehensive-procurement-guidelines-cpg</p>
LANDSCAPING	CPGs I, II, III & V	
NON-PAPER OFFICE	CPGs I, II, III & IV	
PAPER	CPG I	
PARK & RECREATION	CPGs I, II & III	
TRANSPORTATION	CPGs I & II	
VEHICULAR	CPGs I & IV	
MISCELLANEOUS	CPGs II, III & IV	

<https://www.epa.gov/smm/product-resource-guides-comprehensive-procurement-guideline-cpg-program> provides resource guides for each product category, summarizing items designated in the product category and their recovered materials content recommendations

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How to Develop a Comment: General Pointers

- Read and understand the document you are commenting on
- Follow directions
- Be concise but support your claims
- Base your comments on sound reasoning and scientific evidence
- Address trade-offs and opposing views
- One well-supported comment is more informative than a thousand form letters
- Submit by the comment period deadline
- Follow rules and restrictions

<https://www.epa.gov/dockets/commenting-epa-dockets>
provides general guidance on making effective comments

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How to Develop a Comment: Designations

1. Based on procuring agencies purchases, are the right items designated?
2. Do the items currently designated represent items that procuring agencies purchase?
3. Should items be deleted, added or modified? Why?

EPA's Designation Criteria:

- **Use of Materials Found in Solid Waste**

- Is the item made using a material that represents a significant portion of the solid waste stream?

- **Economic and Technological Feasibility and Performance**

- Does the item perform as well as necessary to meet a procuring agency's needs?
- Are there government, ASTM or other consensus standards or specifications that would enable a procuring agency to buy the item containing recovered materials?
- Is the item available at a reasonable price considering normal market fluctuations?

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EPA's Designation Criteria cont'd:

- **Impact of Government Procurement**
 - Is the item purchased in appreciable quantities by the Federal government or by state and local governments?
- **Availability and Competition**
 - Is the item available from an adequate number of sources to ensure competition?
 - Is the item generally available, rather than available in a limited market area?
- **Other Uses for Recovered Materials**
 - Will recovered materials be diverted from one product to another, creating offsets and/or shortages?
 - Can manufacturers obtain recovered materials in sufficient quantity to produce the item(s)?
- **Other Considerations**
 - Is the relative price of an item with recovered materials content significantly higher than the relative price of a comparable virgin product?
 - Can be it shown that an item meets all of EPA's selection criteria? (E.g., insufficient information may be available for experimental or developmental products)

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How to Develop a Comment: Recommendations

1. Are the recommended recovered content levels/ranges appropriate? If not, please provide appropriate levels.
2. Are the published specifications appropriate? If not, please provide appropriate specifications.

Information Used by EPA:

- **Recovered material content levels**

- What levels of recovered materials content are used in the product?
- Is the recovered materials content postconsumer material? What percentage is postconsumer?

- **Sources**

- What is the source of the information provided (e.g., industry studies, technical journals)?
- Where can purchasing agencies purchase the item (with vendor's company name, address, contact name and phone number)?

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How to Submit a Comment

<https://www.epa.gov/cpg>

EPA's main CPG-program webpage links to the FR Notice

Comprehensive Procurement Guideline (CPG) Program

The Comprehensive Procurement Guideline (CPG) program is part of EPA's Sustainable Materials Management initiative that promotes a system approach to reducing materials use and the associated environmental impacts over the materials' entire life cycle.

The CPG program is authorized by Congress under Section 6002 of the [Resource Conservation and Recovery Act \(RCRA\)](#) (42 U.S. Code 6962).

CPG continues the effort to promote the use of materials recovered from the municipal solid waste stream. Buying products made with recovered materials ensures that the materials collected in recycling programs will be used again in the manufacture of new products. There are 61 products designated in eight categories.

Seeking Comments

EPA is seeking comment on its current list of items that are or can be made from recovered materials and its recommendations to federal agencies on purchasing these designated items. [Learn more in this notice.](#)

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How to Submit a Comment cont'd

The FR Notice webpage provides a button for quick online comment submission



The screenshot shows the top of the Federal Register website. On the left is the National Archives logo. In the center is the text "FEDERAL REGISTER" with the subtitle "The Daily Journal of the United States Government". To the right is the seal of the National Archives and Records Administration. Below this is a blue bar with a "Notice" icon and the word "Notice". The main heading of the notice is "Existing Comprehensive Procurement Guideline Designations and Recovered Materials Advisory Notice Recommendations: Request for Comments". Below the heading, it says "A Notice by the Environmental Protection Agency on 04/07/2020". A grey box contains the text "This document has a comment period that ends in 48 days. (07/06/2020)". To the right of this box is a green button labeled "SUBMIT A FORMAL COMMENT" which is circled in red. Below the button is a link that says "Read the 8 public comments". On the far right, there is a vertical "Site Feedback" button.

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Once You Have Submitted a Comment

- EPA will review all comments received and determine next steps
- Any future revisions to the CPG or RMANs will be noticed in the Federal Register
- EPA will also make every attempt to alert the public when an action is forthcoming

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THANK YOU!

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